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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

LINDA GATSON, an individual,

Plaintiff,

vs.

OCWEN LOAN SERVICING, LLC; and
Does 1 through 100, inclusive;

Defendants.

Case No: 3:14-CV-04161-JST

**STIPULATION TO CONTINUE
TRIAL RELATED DEADLINES AND
MEDIATION COMPLETION DATE;
~~PROPOSED ORDER~~**

Complaint Filed: September 15, 2014
Trial Date: April 4, 2016

RECITALS

Plaintiff LINDA GATSON and Defendant OCWEN LOAN SERVICING, LLC
(collectively, the “Parties”) by and through their respective counsel of record, and subject to the
Court’s approval, hereby stipulate and agree as follows:

WHEREAS, Plaintiff filed their Complaint in this action on September 15, 2014;

WHEREAS, this case was referred to mediation with a mediation completion date,
initially of September 15, 2015 and then moved to September 29, 2015;

WHEREAS, on September 22, 2015, the Parties engaged in a phone call with the
mediator and it was agreed that it would be in the best interest of the Parties to postpone the
mediation until November 12, 2015, to allow Plaintiff time to submit, and for Defendant to
review, a loan modification application and/or other foreclosure alternative application;

WHEREAS, the Parties agree that it is in their best interests to determine Plaintiff’s
eligibility for a loan modification or other alternative to foreclosure prior to mediating this
matter, and therefore, the parties and mediator Gilda R. Turitz agreed to continue the mediation
to November 12, 2015, a date now scheduled by both the Parties and mediator, Ms. Turitz;

WHEREAS, to comply with the Court’s order concerning the Mediation Completion
Date, the Parties (with the support of assigned mediator Gilda R. Turitz) request a further
extension of time by which they must complete mediation to November 12, 2015;

WHEREAS, the Parties have engaged in written discovery and anticipate to complete
deposition(s), which will then complete discovery;

WHEREAS, the Parties also agree that because an informal resolution of this matter may
be reached at mediation, it is in the Parties best interest and it preserves judicial economy to
extend the discovery related deadlines in this case;

1 WHEREAS, the Parties agree and represent that they are informed and believe that the
2 requested extensions herein will not prejudice and/or effect all other dates ordered by the above
3 entitled court in this matter,

4 **STIPULATION**

5 IT IS THEREFORE STIPULATION AND AGREED, by and among the Parties, and subject
6 to the approval of the Court, that:

- 7
- 8 1. The mediation completion date in this matter be extended to November 12, 2015;
 - 9 2. The fact discovery cut-off be extended from November 6, 2015 to December 4, 2015;
 - 10 3. The date by which the Parties must exchange expert disclosures be extended from
11 October 23, 2015 to December 7, 2015;
 - 12 4. The date by which the Parties must exchange rebuttal expert disclosures be extended
13 from November 13, 2015 to December 28, 2015;
 - 14 5. Expert Discovery cut-off be extended from December 4, 2015 to January 18, 2015.

15
16 Respectfully Submitted,

17 DATED: September 28, 2015

MELLEN LAW FIRM

18 /s/ Sarah Shapero

19 Sarah Shapero
20 Attorneys for Plaintiff
Linda Gatson

21 DATED: September 28, 2015

HOUSER & ALLISON

22 /s/ Jason K. Boss


23 Jason K. Boss
24 Attorneys for Defendant
Ocwen Loan Servicing, LLC

PROPOSED ORDER

Having reviewed the above stipulation of the Parties and good cause appearing therefore, IT
IS SO ORDERED.

1. The mediation completion date is November 12, 2015;
2. The fact discovery cut-off is December 4, 2015;
3. The date by which the Parties must exchange expert disclosures is December 7, 2015;
4. The date by which the Parties must exchange rebuttal expert disclosures is December 28, 2015;
5. Expert Discovery cut-off is January 18, 2015.

DATED: September 29, 2015


Hon. Jon S. Tigar
United States District Court Judge